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NEVADA COMMISSION FOR  
COMMON INTEREST COMMUNITIES  
AND CONDOMINIUM HOTELS

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1 **SR**  
2 **LEACH KERN GRUCHOW SONG**  
3 JOHN E. LEACH, ESQ.  
4 Nevada Bar No. 1225  
5 E-mail: [jleach@lkglawfirm.com](mailto:jleach@lkglawfirm.com)  
6 RYAN D. HASTINGS, ESQ.  
7 Nevada Bar No. 12394  
8 E-mail: [rhastings@lkglawfirm.com](mailto:rhastings@lkglawfirm.com)  
9 2525 Box Canyon Drive  
10 Las Vegas, Nevada 89128  
11 Telephone: (702) 538-9074  
12 Facsimile: (702) 538-9113

13 Attorneys for Respondent

14 **BEFORE THE COMMISSION FOR COMMON-INTEREST**  
15 **COMMUNITIES AND CONDOMINIUM HOTELS**  
16 **STATE OF NEVADA**

17 SHARATH CHANDRA, Administrator,  
18 REAL ESTATE DIVISION, DEPARTMENT  
19 OF BUSINESS AND INDUSTRY, STATE  
20 OF NEVADA,

Case No.: 2023-384

21 Petitioner,

22 vs.

23 MANTOVA COMMUNITY ASSOCIATION,  
24 CHARLES WRIGHT, PAMELIA LOWRY,  
25 and TRICIA YOST,  
26 (Entity Number C18509-2002)

27 Respondents.

28 **SUPPLEMENT TO ANSWER TO COMPLAINT FOR DISCIPLINARY ACTION AND**  
**STATUS REPORT FOR COMMISSION HEARING**  
**DECEMBER 3-5, 2024**

The Respondents, MANTOVA COMMUNITY ASSOCIATION, CHARLES WRIGHT, PAMELIA LOWRY, and TRICIA YOST (collectively "Respondents"), hereby submit this Supplemental to Answer to the Complaint for Disciplinary Action and Status Report for the Commission Hearing scheduled for December 3-5, 2024.

**VIOLATIONS OF LAW**

1. Performance of the Reserve Study. Respondents have performed the required Reserve Study. On December 6, 2023, Complex Solutions, Ltd., prepared the Mantova Community Association Level 2 Reserve Study (the "Reserve Study"). A copy of the Reserve

LEACH KERN GRUCHOW SONG  
2525 Box Canyon Drive, Las Vegas, Nevada 89128  
Telephone: (702) 538-9074 -- Facsimile (702) 538-9113

1 Study is attached hereto as Exhibit “A.” The Reserve Study, and the calculations set forth  
2 therein, including the scheduled reserve expenditures were used to prepare the funding plan that  
3 was submitted to the Commission as Exhibit “3” to the Answer to the Complaint for Disciplinary  
4 Action (the “Answer”). While the Reserve Study was not obtained in a timely manner, the  
5 Association is currently in compliance with NRS 116.31152(1)(a).

6 2. Filing Form 609. Respondents acknowledge they have submitted a Reserve Study  
7 Form (Form 609) to the Division. On January 27, 2024, Charles Wright, the President of the  
8 Association, signed Form 609, which was submitted to the Division. A copy of the Form 609  
9 signed by Mr. Wright is attached as Exhibit “2” to the Answer.

10 3. Underfunding of Reserve Account/Funding Plan. As more fully set forth in the  
11 Answer, the Association has adopted a funding plan that covers 2024-2028. A copy of the  
12 funding plan is attached as Exhibit “3” to the Answer. The funding plan projected that as of  
13 December 31, 2024, the balance in the reserve account would be \$994,993.00. However, as of  
14 November 18, 2024, the Association’s bank records reflect a balance in the reserve account of  
15 \$1,170,649.68. A copy of the relevant record is attached hereto as Exhibit “B.” The reserve  
16 balance is due largely to the Special Reserve Assessment (“SRA”) that was implemented on  
17 January 27, 2023. The SRA required each owner to make a \$7,000 payment on or before March  
18 31, 2024, with monthly payments due thereafter at the rate of \$321.00 per month through  
19 December 31, 2025. Attached hereto as Exhibit “C” is a delinquency report reflecting that the  
20 total amount of the delinquencies related to the SRA is \$62,420.00. The Board is working with  
21 the owners and its collection company to recover the delinquencies. Based on the foregoing, the  
22 Respondents assert that as of the date of the continued Commission hearing, the Association is in  
23 compliance with its proposed funding plan.

24 4. Visa Gift Cards. At the original hearing, the Respondents provided the  
25 Commission with documentation confirming that the Association had purchased gift cards  
26 totaling \$1,200.00. The gift cards were used to purchase maintenance supplies needed to  
27 complete the projects that were in progress. The Respondents also provided receipts verifying the  
28 expenditure of \$1,070.71 for the stated purpose. The Respondents were unable to locate the

**LEACH KERN GRUCHOW SONG**  
2525 Box Canyon Drive, Las Vegas, Nevada 89128  
Telephone: (702) 538-9074 – Facsimile (702) 538-9113

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receipts for the remaining \$129.29. Attached hereto as Exhibit “D” are the Affidavits of Pamela Lowry and Charles Wright, members of the Board when the gift cards were purchased stating with certainty that the Visa gift cards purchased by the Association between January 9, 2021, and April 10, 2021, were used solely to acquire maintenance supplies needed to complete projects within the Association.


In summary, the Association believes that if the Commission accepts this funding plan, the Association will be in compliance with NRS 116.3115(2).

Based on the foregoing, the Respondents respectfully requests that the Commission not impose monetary sanctions on the Respondents.

DATED this 21 day of November, 2024.

LEACH KERN GRUCHOW SONG

By: \_\_\_\_\_

  
JOHN E. LEACH, ESQ.  
RYAN D. HASTINGS, ESQ.  
2525 Box Canyon Drive  
Las Vegas, Nevada 89128  
Attorneys for Respondent

LEACH KERN GRUCHOW SONG  
2525 Box Canyon Drive, Las Vegas, Nevada 89128  
Telephone: (702) 538-9074 – Facsimile (702) 538-9113

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), the undersigned, an employee of LEACH KERN GRUCHOW SONG, hereby certified that on the 21st day of November, 2024, she served a true and correct copy of the foregoing, STATUS REPORT, by:

- Depositing for mailing, in a sealed envelope, U.S. postage prepaid, at Las Vegas, Nevada
- Personal Delivery
- Facsimile
- Federal Express/Airborne Express/Other Overnight Delivery
- Las Vegas Messenger Service
- Electronic Service – via E-mail

addressed as follows:

Aaron D. Ford, Esq.  
Attorney General  
Phil W. Su, Esq.  
Senior Deputy Attorney General  
1 State of Nevada Way, #100  
Las Vegas, NV 89119  
Via Email: [psu@ag.nv.gov](mailto:psu@ag.nv.gov)

Maria Gallo, Commission Coordinator  
Common-Interest Communities  
and Condominium Hotels  
3300 W. Sahara Avenue, Suite 350  
Las Vegas, NV 89102  
Via Email: [mgallo@red.nv.gov](mailto:mgallo@red.nv.gov)

/s/ Merlin Calimpong  
An employee of LEACH KERN GRUCHOW  
SONG